



Vincent D. Kelly
President and CEO

March 15, 2006

Nancy Victory, Chair
Independent Panel on the Impact of Hurricane Katrina
on Communications Networks
c/o Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Dear Ms. Victory,

Thank you for the opportunity to address the FCC's Independent Panel on the Impact of Hurricane Katrina on Communications Networks (the Panel) in Jackson, MS on March 6, 2006.

One of the facts established during the hearings is that the hurricane substantially impaired the terrestrial broadband voice and data networks in the Gulf Coast. Another fact is that the narrowband networks of paging service providers held up much better during the hurricane.

I respectfully submit that the Panel should recommend to the Commission that law enforcement and other emergency responders maintain at least two distinct capabilities for wireless communication in times of crisis. These capabilities should use alternate, non-duplicative networks, so that if one network is unavailable due to a physical breakdown or overloading, the other network will be free of those impairments and will be available for use.

Paging was the only wireless communications service available to many people in the region during the storm and for many days thereafter. This resulted from several unique factors, including:

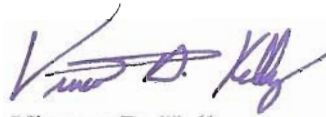
- paging's independence from the public switched telephone network (PSTN) through its use of satellite signal carriage and network control;

- paging's use of high elevation antennas, high power transmissions, and simulcasting of signals from multiple antennas, which enabled service to continue despite the temporary loss of some transmitters; and
- pagers' reliance on AA or AAA battery power, where the failure of the power grid along the Gulf Coast meant that other wireless communication devices could not be recharged and became useless.

Pagers were in wide use throughout the Gulf Coast region prior to the hurricane's appearance – USA Mobility alone had over a quarter of a million paging units in service in Louisiana, Mississippi, and Alabama as of July 31, 2005. The devices are easy to operate, and users require no special training.

For all these reasons, paging services play a vital role in responding to emergencies, and the Panel should recommend that the Commission affirmatively recognize their importance to our nation's ability to maintain effective communications during crisis situations.

Sincerely,



Vincent D. Kelly

cc: Lisa Fowlkes